

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

RUTH MILLER and GALEN G. SWINGEN,)	
)	
Plaintiffs,)	
)	
v.)	CIVIL NO. 1:19-CV-49
)	
AARP SERVICES, INC., AARP, INC., AARP OF THE VIRGIN ISLANDS, INC., GRUPO)	ACTION FOR DAMAGES, BREACH OF CONTRACT, BAD
COOPERATIVO SEGUROS MULTIPLES,)	FAITH, BREACH OF DUTY OF
COOPERATIVA DE SEGUROS MÚLTIPLES)	GOOD FAITH AND FAIR
OF PUERTO RICO, OVERSEAS INSURANCE)	DEALING, BREACH OF
AGENCY, INC., SEDGWICK CLAIMS)	FIDUCIARY DUTY, DECEPTIVE
MANAGEMENT SERVICES, INC.,)	TRADE PRACTICES, FRAUD
VERICLAIM, INC., and RUSSELL RAGSDALE,)	AND MISREPRESENTATION
)	
Defendants.)	
)	

**EMERGENCY JOINT MOTION TO EXTEND DEADLINE
TO FILE STIPULATIONS OF DISMISSAL
AND TO CONTINUE STATUS CONFERENCE
SCHEDULED FOR AUGUST 4, 2023**

COME NOW the Parties, by and through their respective undersigned counsel, and jointly move this Honorable Court for the entry of an Order extending the time for the Parties to file Stipulations of Dismissal until August 7, 2023, and continuing the status conference from August 4, 2023, should the Parties not file the dismissal Stipulations by August 7, 2023. In support thereof the Parties further state:

All Parties have been negotiating the language of the Releases in this case. One Release will be executed regarding the AARP and Adjuster Defendants, jointly; and another Release will be executed regarding Defendant, Grupo.

As to the AARP/ Adjuster Defendants' Release, the Parties need additional time to obtain fully executed Releases and to comply with other, confidential, portions of the

Settlement and Release Agreement. They jointly anticipate that the filling of the Stipulation for Dismissal as to these Defendants will be accomplished by August 7, 2023.

As to the Grupo Defendant's Release, the Parties have not reach agreement on all of the terms of the Release. However, Plaintiffs and Defendant, Grupo anticipate that they will either reach agreement and be ready to file the Stipulation of Dismissal by August 7, 2023, or, will advise the Court that they could not reach agreement on the terms of the Release by that date.

Finally, Plaintiffs' counsel will be traveling back from Atlanta, Georgia, on August 4, 2023, at 11:17 am, where she will be assisting in an in person mediation regarding her step-granddaughter's wrongful death case. Consequently, she will not be available to appear in person or virtually at the scheduled status conference at 10:00 am that day. Due to the schedules of counsel for the Parties, the Parties request that if a status conference is needed it be scheduled for August 28, 29 or 30, 2023; and that only counsel for the Plaintiffs and any Defendant that has not been dismissed prior to that date be required to appear.

WHEREFORE, the Parties jointly ask this Honorable Court for the entry of an Order extending the time to file dismissal Stipulations until August 7, 2023; and, continuing the status conference scheduled for August 4, 2023, until August 28, 29 or 30, 2023.

LAW OFFICES OF PAMELA LYNN COLON, LLC
Attorney for Plaintiffs

DATED: July 31, 2023

/s/ Pamela Lynn Colon, Esquire
Pamela Lynn Colon, Esquire
Law Offices of Pamela Lynn Colon, LLC
2155 King Cross Street—Ste. 3
Christiansted, VI 00820-4842
Tel: (340) 719-7100
Fax: (340) 719-7700
pamelalcolon@msn.com